

ORIGINAL

Approved: _____

SARAH MORTAZAVI
Assistant United States Attorney

19 MAG 0508

Before: The Honorable Sarah Netburn
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA
- v. -
JASPER GRAYSON,
ENRICO PEDRAZA, and
FELICIA CALDWELL,
Defendants.
----- X

SEALED COMPLAINT

Violations of
18 U.S.C. §§ 1344
1349, and 2

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

JAMON PARHAM, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE

(Conspiracy to Commit Bank Fraud)

1. From at least on or about June 5, 2018 up to and including July 6, 2018, JASPER GRAYSON, ENRICO PEDRAZA, and FELICIA CALDWELL, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that JASPER GRAYSON, ENRICO PEDRAZA, and FELICIA CALDWELL, the defendants, and others known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody

and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Bank Fraud)

3. From at least on or about June 5, 2018 up to and including July 6, 2018, in the Southern District of New York and elsewhere, JASPER GRAYSON, ENRICO PEDRAZA, and FELICIA CALDWELL, the defendants, did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution insured by the Federal Deposit Insurance Corporation, by means of material false and fraudulent pretenses, representations, and promises, to wit, defendant GRAYSON deposited stolen, forged, and/or altered checks into bank accounts owned by others, including PEDRAZA and CALDWELL, in an attempt to fraudulently withdraw said funds.

(Title 18, United States Code, Sections 1344 and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

4. I am a United States Postal Inspector and have been for approximately six years. I have personally participated in numerous investigations into criminal offenses involving bank fraud, and am familiar with some of the means and methods used to commit such offenses. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, on my conversations with other law enforcement officials and other individuals, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my personal involvement in the investigation, my conversations with law enforcement agents and

others, as well as my review of reports and records, I have learned the following:

a. On or about July 8, 2018, an individual (the "Victim") reported to the New York City Police Department ("NYPD"), in substance and in part, that an unknown person had cashed five checks numbered 421, 422, 423, 424, and 440 totaling approximately \$97,650, purportedly drawn from the Victim's checking account, without the Victim's knowledge or permission (the "421 Check," the "422 Check," the "423 Check," the "440 Check," and together, the "Checks"). The Victim did not recognize the names of the individuals who had received the Checks.

b. From my review of the 421 Check, I have learned that it was dated June 5, 2018, FELICIA CALDWELL, the defendant, was named as the payee, the check was for \$9,650, and the Victim's bank account information was listed at the bottom of the check. On or about June 5, 2018, the 421 Check was deposited into an account at a national bank ("Bank-1") ending in numbers 4855 (the "4855 Account"). The account holder of the 4855 Account is CALDWELL.

6. From my review of surveillance images and Department of Motor Vehicle ("DMV") and other photographs of JASPER GRAYSON, the defendant, I believe that GRAYSON deposited the 421 Check at an Automated Teller Machine ("ATM") at a Bank-1 bank branch located in Mount Vernon, New York.

7. From my review of call records and phone subscriber information for a telephone number ending in 7104 (the "7104 Cell"), I have learned that the 7104 Cell is subscribed to in the name of JASPER GRAYSON, the defendant, and that on or about June 5, 2018, there were six calls between the 7104 Cell and a telephone number ending in 1657 (the "1657 Cell"). From my review of law enforcement databases, I have learned that the 1657 Cell is associated with FELICIA CALDWELL, the defendant.

8. From my review of bank account records for FELICIA CALDWELL's, the defendant's, account, I have learned that on or about June 15, 2018, CALDWELL transferred approximately \$2,000 through a mobile payment application to a user named "Jasper" from the 4855 Account.

9. From my review of the 422 Check, I have learned that it was dated June 19, 2018, ENRICO PEDRAZA, the defendant,

was named as the payee, the check was \$18,000 and the Victim's bank account information was listed at the bottom of the check. On or about June 19, 2018, the 422 Check was deposited into a Bank-1 bank account ending in numbers 2075 (the "2075 Account"). The account holder of the 2075 Account is PEDRAZA.

10. From my review of surveillance images from Bank-1, I have learned that on or about June 19, 2018, a male seated in a white vehicle with license plate number "CGI1269" (the "Vehicle") deposited the 422 Check using a drive-through ATM located at a Bank-1 bank branch. From my review of surveillance images showing the driver of the Vehicle and DMV photos of JASPER GRAYSON, the defendant, I believe that GRAYSON deposited the 422 Check.

11. From my review of the Vehicle's registration information, I have learned that the Vehicle is registered to Hertz Vehicles, LLC ("Hertz"). From my review of Hertz's rental records for the Vehicle on June 19, 2018, I learned that JASPER GRAYSON, the defendant, rented the Vehicle from Hertz from June 16, 2018, through on or about June 25, 2018.

12. From my review of the 423 Check, I have learned that it was dated June 28, 2018, "Enrico Pendraza," a variation of the name of ENRICO PEDRAZA, the defendant, was named as the payee, the check was \$40,000, and the Victim's bank account information was listed at the bottom of the check. On or about June 28, 2018, the check was deposited into the 2075 Account.

13. From my review of surveillance images, and DMV and other photographs of JASPER GRAYSON, the defendant, I believe that GRAYSON deposited the 423 Check at a teller window at a Bank-1 bank branch.

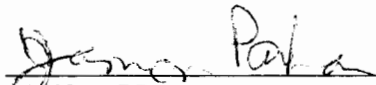
14. From my review of account records from Bank-1, I have learned that on or about July 10, 2018, ENRICO PEDRAZA, the defendant, withdrew \$20,000 from the 2075 Account and converted it to a \$20,000 cashier's check directed to FELICIA CALDWELL, the defendant.

15. From my review of the 440 Check, I have learned that it was dated July 7, 2018, was directed to a particular individual ("Individual-1"), the check was \$14,000, and the Victim's bank account information was listed at the bottom of

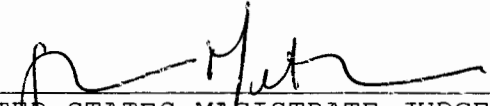
the check. On or about July 2, 2018, the 440 Check was deposited into an account at a national bank ("Bank-2") ending in numbers 2173 (the "2173 Account"). The account holder of the 2173 Account is the same as the payee name on the 440 Check.

16. From my review of surveillance footage and DMV and other photographs of JASPER GRAYSON, the defendant, I believe that GRAYSON deposited the 440 Check at an ATM at a Bank-2 bank branch.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of JASPER GRAYSON, ENRICO PEDRAZA, and FELICIA CALDWELL, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.


SAMON PARHAM
Postal Inspector
United States Postal Inspection Service

Sworn to before me this
15 day of January, 2019


UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK